etchant injector assembly disclosed in Ketchum. In Ketchum, the open end of the injector assembly is fitted with a diffusing screen 40 and suspended above floor 32. The Examiner asserts that Ketchum discloses a seal "located around element 40." This assertion is not correct. Element 40 is a diffusing screen. The only structure "located around element 40" appears to be a frame that supports diffusing screen 40. There is nothing in Ketchum that teaches or suggests that this part is anything other than a frame that supports diffusing screen 40, just like the frame around an ordinary window screen. This apparent frame/support structure is not mentioned in Ketchum and there is no reason to *assume* it is a seal. There is no need for a seal in Ketchum and none is disclosed. If the Examiner disagrees, she is respectfully requested to specifically point out those passages in Ketchum that teach or even suggest there is a seal around diffusing screen 40. Absent such a showing, the Section 102 rejection of Claims 15 and 21 should be withdrawn.

Claims 28, 29 and 32 require introducing a liquid etchant into the etch chamber. As the Examiner correctly notes in her remarks, Ketchum teaches injecting a vaporized etchant into a deposition reactor. Introducing a liquid etchant into the chamber is not the same as injecting a vaporized etchant. In fact, this is one of the primary novel features of the various embodiments of the invention. The use of a vaporized etchant such as that shown in Ketchum is specifically noted in the Background section of the Specification at page 3, lines 15-20. The claimed invention was developed to help overcome the disadvantages of the prior art vaporized etchant systems. Background, pages 2-3 and Summary, pages 3-4.

Ketchum clearly does not teach all of the limitations in Claims 28, 29 and 32 and, therefore, the Section 102 rejection of those claims should be withdrawn.

Claims 16, 22-23 and 30-31 also distinguish patentably over Ketchum due to their dependence on Claims 15, 21 and 30, respectively.

Rejections Under 35 U.S.C. § 103

Claims 17 and 18-20 were rejected under Section 103 as being obvious over

Ketchum in view of Bond (4,124,437). Ketchum is relied on for teaching all claim limitations except a window and a closed end. Claim 18 requires a chamber defining a liquid etchant inlet and a seal disposed about the open end of the chamber. Claim 17 depends from Claim 15. For the reasons noted above, Ketchum does not teach or suggest a chamber defining a liquid etchant inlet or a seal disposed about the open end of the chamber. For these same reasons, dependent Claim 17 and Claim 18 distinguish over Ketchum and Bond under Section 103. Claims 19-20 also distinguish over the cited references due to their dependence on Claim 18.

The application is in condition for allowance.

Respectfully submitted,

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